UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,	)	Criminal No. 16-CR-257(9) (DWF/TNL)
	)	
v. Plaintiff,	)	
	)	**DEFENDANT'S MOTION FOR**
TODD VASSEY,	)	**DISCOVERY AND INSPECTION OF**
	)	**PRODUCTS AND RECORDS OF**
Defendant.	)	**ELECTRONIC SURVEILLANCE**

Comes now the defendant, Todd Vassey, by and through his attorney, Lauren Campoli, respectfully moves the Court for an order directing the government to disclose and to certify the extent of the electronic surveillance, including either wire- tapping and interceptions of telephone conversations, or any form of surveillance by radio transmissions or receptions, or any other form of electronic surveillance or detection used by the government in any phase of its investigation of the defendant, and further, requiring that the government disclose the same to the defendant and to make available to him all matters pertaining thereto (including applications for any order authorizing such forms or surveillance, any such authorizing order, the logs of any government agent of employee or other persons conducting such surveillance, copies of recordings made under the surveillance, copies of the transcripts of such recordings, and any and all returns of inventories made by the government respecting such surveillance), including all such items which are of record and all matters, whether or not of record, which were within the possession, custody or control of the government, the existence of which is known, or by the exercise of due diligence may become known, to the attorney for the government.

Dated: April 21, 2017

Respectfully submitted,

/s Lauren Campoli

Lauren Campoli

Attorney for Defendant
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